

REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 2, 2008 (Paper No. 20080619). Upon entry of this response, claims 1-2, 4, 10-24, 55-56, 58, 72-114, 116-215, and 236-255 are pending in the application. In this response, claims 248-255 are added. Applicant respectfully requests entry of the amendments herein and reconsideration of all pending claims.

1. Initial Matters

Applicant notes that claim 115 was inadvertently omitted from the claim listing submitted in the last response. However, claim 115 has not been cancelled, and thus remains pending.

2. Rejection of Claims 1-2, 4, 20, 55-56, 72-79, 86, 90-92, 127-128, 135, 160-161, 167, 171, 173-174, 210-214, 228, and 236-247 under 35 U.S.C. §103

Claims 1-2, 4, 20, 55-56, 72-79, 86, 90-92, 127-128, 135, 160-161, 167, 171, 173-174, 210-214, 228, and 236-247 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al.* (U.S. Pub. No. 2006/0212919). Applicant respectfully traverses the rejection. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. §103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest (either implicitly or explicitly) all elements/features/steps of the claim at issue. See, e.g., *In re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

a. Independent Claim 1

Claim 1 is allowable for at least the reason that the proposed combination does not disclose, teach, or suggest “network address translation (NAT) logic configured to translate an IP address in one of the packets that is destined for the first CPE data device to a NAT process

IP address such that the NAT process IP address has a subnet different than the management IP address". The Office Action does not even allege that the combination teaches this feature, and apparently (based on the language of the rejection, reproduced below) analyzed the previous version of the claims:

Cameron teaches a radio frequency cable network device that implements at least one gateway service, comprising:
"network address translation (NAT) logic configured to translate an IP address in one of the packets that is destined for the first CPE data device (organization) to a second IP address having a subnet (external addresses) different than the first IP address (paragraph [0091])..
(Office Action, p. 4)

The cited paragraph *Cameron* contains a brief discussion of network address translation, reproduced below:

NAT Network Address Translation. An Internet standard that enables a local-area network (LAN) to use one set of IP addresses for internal traffic and a second set of addresses for external traffic. A NAT box located where the LAN meets the Internet makes all necessary IP address translations. NATs serve two main purposes: They provide a type of firewall by hiding internal IP addresses and they enable a company to use more internal IP addresses. Since they're only used internally, there's no possibility of conflict with IP addresses used by other companies and organizations.
(Cameron, para. 0091)

Cameron thus appears to disclose translating from an internal address to an external address. However, this does not teach the specific feature recited in claim 1: network address translation logic configured to translate "such that the second IP address has a subnet different than the management IP address". Neither *Edson* nor *Tsang et al* appear to discuss network address translation at all.

Thus, the proposed combination of *Edson* in view of *Cameron* does not teach at least the features described above that are recited in amended claim 1. Since the proposed combination does not teach at least the above-described features, a prima facie case establishing an obviousness rejection has not been made. Therefore, claim 1 is not obvious under the proposed combination of *Edson* in view of *Cameron*, and the rejection should be withdrawn.

b. Independent Claim 55

Claim 55 is allowable for at least the reason that the proposed combination does not disclose, teach, or suggest “translating an IP address in one of the packets that is destined for the first CPE data device to a NAT process IP address such that the NAT process IP address has a subnet different than the management IP address”. The Office Action does not even allege that the combination teaches this feature, and apparently (based on the language of the rejection, reproduced below) analyzed the previous version of the claims:

Cameron teaches a radio frequency cable network device that implements at least one gateway service, comprising:

“network address translation (NAT) logic configured to translate an IP address in one of the packets that is destined for the first CPE data device (organization) to a second IP address having a subnet (external addresses) different than the first IP address (paragraph [0091])..
(Office Action, p. 4)

The cited paragraph *Cameron* contains a brief discussion of network address translation, reproduced below:

NAT Network Address Translation. An Internet standard that enables a local-area network (LAN) to use one set of IP addresses for internal traffic and a second set of addresses for external traffic. A NAT box located where the LAN meets the Internet makes all necessary IP address translations. NATs serve two main purposes: They provide a type of firewall by hiding internal IP addresses and they enable a company to use more internal IP addresses. Since they're only used internally, there's no possibility of conflict with IP addresses used by other companies and organizations.
(Cameron, para. 0091)

Cameron thus appears to disclose translating from an internal address to an external address. However, this does not teach the specific feature recited in claim 55: translating...such that the NAT process IP address has a subnet different than the management IP address”. Neither *Edson* nor *Tsang et al* appear to discuss network address translation at all.

Thus, the proposed combination of *Edson* in view of *Cameron* and *Tsang et al* does not teach at least the features described above that are recited in amended claim 55. Since the proposed combination does not teach at least the above-described features, a prima facie case establishing an obviousness rejection has not been made. Therefore, claim 55 is not obvious

under the proposed combination of *Edson* in view of *Cameron*, and the rejection should be withdrawn.

c. Independent Claim 72

Claim 72 is allowable for at least the reason that the proposed combination does not disclose, teach, or suggest “logic configured to translate an IP address in one of the packets that is destined for the at least one CPE data device to a NAT process IP address such that the NAT process IP address has a subnet different than the management IP address”. The Office Action does not even allege that the combination teaches this feature, and apparently (based on the language of the rejection, reproduced below) analyzed the previous version of the claims:

Cameron teaches a radio frequency (RF) cable network device comprising:

logic configured to translate an IP address in one of the packets that is destined for the at least one CPE data device (organization) to a NAT process such that the NAT process IP address has a subnet different (external addresses) than another IP address (paragraph [0091])..
(Office Action, p. 9)

The cited paragraph *Cameron* contains a brief discussion of network address translation, reproduced below:

NAT Network Address Translation. An Internet standard that enables a local-area network (LAN) to use one set of IP addresses for internal traffic and a second set of addresses for external traffic. A NAT box located where the LAN meets the Internet makes all necessary IP address translations. NATs serve two main purposes: They provide a type of firewall by hiding internal IP addresses and they enable a company to use more internal IP addresses. Since they're only used internally, there's no possibility of conflict with IP addresses used by other companies and organizations.
(Cameron, para. 0091)

Cameron thus appears to disclose translating from an internal address to an external address. However, this does not teach the specific feature recited in claim 72: logic configured to “translate...such that the NAT process IP address has a subnet different than the management IP address”. Neither *Edson* nor *Tsang et al* appear to discuss network address translation at all.

Thus, the proposed combination of *Edson* in view of *Cameron* and *Tsang et al* does not teach at least the features described above that are recited in amended claim 72. Since the proposed combination does not teach at least the above-described features, a prima facie case establishing an obviousness rejection has not been made. Therefore, claim 72 is not obvious under the proposed combination of *Edson* in view of *Cameron*, and the rejection should be withdrawn.

d. Independent Claim 210

Claim 210 is allowable for at least the reason that the proposed combination does not disclose, teach, or suggest translating an IP address in one of the packets that is destined for the at least one CPE data device to a NAT process IP address such that the NAT process IP address has a subnet different than the management IP address". The Office Action does not even allege that the combination teaches this feature, and apparently (based on the language of the rejection, reproduced below) analyzed the previous version of the claims:

Cameron teaches a radio frequency (RF) cable network device comprising:

logic configured to translate an IP address in one of the packets that is destined for the at least one CPE data device (organization) to a NAT process such that the NAT process IP address has a subnet different (external addresses) than another IP address (paragraph [0091]).
(Office Action, p. 9)

The cited paragraph *Cameron* contains a brief discussion of network address translation, reproduced below:

NAT Network Address Translation. An Internet standard that enables a local-area network (LAN) to use one set of IP addresses for internal traffic and a second set of addresses for external traffic. A NAT box located where the LAN meets the Internet makes all necessary IP address translations. NATs serve two main purposes: They provide a type of firewall by hiding internal IP addresses and they enable a company to use more internal IP addresses. Since they're only used internally, there's no possibility of conflict with IP addresses used by other companies and organizations.
(Cameron, para. 0091)

Cameron thus appears to disclose translating from an internal address to an external address. However, this does not teach the specific feature recited in claim 210: “translating...such that the NAT process IP address has a subnet different than the management IP address”. Neither *Edson* nor *Tsang et al* appear to discuss network address translation at all.

Thus, the proposed combination of *Edson* in view of *Cameron* and *Tsang et al* does not teach at least the features described above that are recited in amended claim 210. Since the proposed combination does not teach at least the above-described features, a prima facie case establishing an obviousness rejection has not been made. Therefore, claim 210 is not obvious under the proposed combination of *Edson* in view of *Cameron*, and the rejection should be withdrawn.

e. Dependent Claims 2, 4, 20, 56, 73-79, 86, 90-92, 127-128, 135, 160-161, 167, 171, 173-174, 211-214, 228, and 236-247

Since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 2, 4, 20, 56, 73-79, 86, 90-92, 127-128, 135, 160-161, 167, 171, 173-174, 211-214, 228, and 236-247 are allowable for at least the reason that each depends from an allowable claim. In re Fine, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicant respectfully requests that the rejection of claims 2, 4, 20, 56, 73-79, 86, 90-92, 127-128, 135, 160-161, 167, 171, 173-174, 211-214, 228, and 236-247 be withdrawn.

3. Rejection of Claims 10-12, 149-150, and 156 under 35 U.S.C. §103

Claims 10-12, 149-150, and 156 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. Pub. No. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Na* (U.S. 6,993,785). The addition of *Na* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims

10-12, 149-150, and 156 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 10-12, 149-150, and 156 be withdrawn.

4. Rejection of Claims 13-19, 21-24, 58, 80-85, 87-89, 130-134, 136-138, 165, and 169 under 35 U.S.C. §103

Claims 13-19, 21-24, 58, 80-85, 87-89, 130-134, 136-138, 165, and 169 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. Pub. No. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 13-19, 21-24, 58, 80-85, 87-89, 130-134, 136-138, 165, and 169 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 13-19, 21-24, 58, 80-85, 87-89, 130-134, 136-138, 165, and 169 be withdrawn.

5. Rejection of Claims 93-94, 100, 104-106, 112, 116-117, and 123 under 35 U.S.C. §103

Claims 93-94, 100, 104-106, 112, 116-117, and 123 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Hooper* (U.S. 5,414,455). Applicant respectfully traverses this rejection. The addition of *Hooper* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 93-94, 100, 104-106, 112, 116-117, and 123 are allowable for at least the reason that each depends from an

allowable claim. Applicant respectfully requests that the rejection of claims 93-94, 100, 104-106, 112, 116-117, and 123 be withdrawn.

6. Rejection of Claims 95-99, 101-103, 107-111, 113-115, 118-122, and 124-126 under 35 U.S.C. §103

Claims 95-99, 101-103, 107-111, 113-115, 118-122, and 124-126 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Hooper* (U.S. 5,414,455) and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Hooper* and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 95-99, 101-103, 107-111, 113-115, 118-122, and 124-126 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 95-99, 101-103, 107-111, 113-115, 118-122, and 124-126 be withdrawn.

7. Rejection of Claim 129 under 35 U.S.C. §103

Claim 129 is rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Bowser* (U.S. 6,870,570). Applicant respectfully traverses this rejection. The addition of *Bowser* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claim 129 is allowable for at least the reason that it depends from an allowable claim. Applicant respectfully requests that the rejection of claim 129 be withdrawn.

8. Rejection of Claim 139 under 35 U.S.C. §103

Claim 139 is rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Okano* (U.S. Pub. No. 2002/0062485). Applicant respectfully traverses this rejection. The addition of *Okano* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claim 139 is allowable for at least the reason that it depends from an allowable claim. Applicant respectfully requests that the rejection of claim 139 be withdrawn.

9. Rejection of Claims 140-144 and 146-148 under 35 U.S.C. §103

Claims 140-144 and 146-148 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Okano* (U.S. Pub. No. 2002/0062485) and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Okano* and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 140-144 and 146-148 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 140-144 and 146-148 be withdrawn.

10. Rejection of Claims 151-155, 157-159, 181, and 185 under 35 U.S.C. §103

Claims 151-155, 157-159, 181, and 185 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Na* (U.S. 6,993,785) and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Na* and *Nazarathy*

does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 151-155, 157-159, 181, and 185 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 151-155, 157-159, 181, and 185 be withdrawn.

11. Rejection of Claims 162-164, 168, and 170 under 35 U.S.C. §103

Claims 162-164, 168, and 170 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 162-164, 168, and 170 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 162-164, 168, and 170 be withdrawn.

12. Rejection of Claims 175-176 under 35 U.S.C. §103

Claims 175-176 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Tseng* (U.S. 5,582,714). Applicant respectfully traverses this rejection. The addition of *Tseng* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 175-176 are allowable for at least the reason that each depends

from an allowable claim. Applicant respectfully requests that the rejection of claims 175-176 be withdrawn.

13. Rejection of Claims 177 and 183 under 35 U.S.C. §103

Claims 177 and 183 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Tseng* (U.S. 5,582,714) and *Na* (U.S. 6,993,785). Applicant respectfully traverses this rejection. The addition of *Tseng* and *Na* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 177 and 183 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 177 and 183 be withdrawn.

14. Rejection of Claims 178-180, 182, 184, and 186 under 35 U.S.C. §103

Claims 178-180, 182, 184, and 186 are rejected under §103(a) as allegedly obvious over *Edson* (6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Na* (U.S. 6,993,785) and *Nazarathy* (6,490,727). Applicant respectfully traverses this rejection. The addition of *Na* and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 178-180, 182, 184, and 186 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 178-180, 182, 184, and 186 be withdrawn.

15. Rejection of Claims 187-188, 194, 198-199, and 215 under 35 U.S.C. §103

Claims 187-188, 194, 198-199, and 215 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Sawyer* (U.S. 6,487,592). Applicant respectfully traverses this rejection. The addition of *Sawyer* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 187-188, 194, 198-199, and 215 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 187-188, 194, 198-199, and 215 be withdrawn.

16. Rejection of Claims 189-191, 193-195, and 197 under 35 U.S.C. §103

Claims 189-191, 193-195, and 197 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Sawyer* (U.S. 6,487,592) and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Sawyer* and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 189-191, 193-195, and 197 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 189-191, 193-195, and 197 be withdrawn.

17. Rejection of Claims 192 and 196 under 35 U.S.C. §103

Claims 192 and 196 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Sawyer* (U.S. 6,487,592) and *Nazarathy* (U.S. 6,490,727)

and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Sawyer* and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 192 and 196 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 192 and 196 be withdrawn.

18. Rejection of Claims 200 and 206 under 35 U.S.C. §103

Claims 200 and 206 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Sawyer* (U.S. 6,487,592) and *Na* (U.S. 6,993,785). Applicant respectfully traverses this rejection. The addition of *Sawyer* and *Na* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 200 and 206 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 200 and 206 be withdrawn.

19. Rejection of Claims 201-203, 205, 207, and 209 under 35 U.S.C. §103

Claims 201-203, 205, 207, and 209 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Sawyer* (U.S. 6,487,592), *Na* (U.S. 6,993,785), and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Sawyer*, *Na*, and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant

respectfully submits that claims 201-203, 205, 207, and 209 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 201-203, 205, 207, and 209 be withdrawn.

20. Rejection of Claims 204 and 208 under 35 U.S.C. §103

Claims 204 and 208 are rejected under §103(a) as allegedly obvious over *Edson* (U.S. 6,526,581) in view of *Cameron* (U.S. 2005/0028206) and *Tsang et al* (U.S. Pub. No. 2006/0212929), and further in view of *Sawyer* (U.S. 6,487,592) and *Nazarathy* (U.S. 6,490,727). Applicant respectfully traverses this rejection. The addition of *Sawyer* and *Nazarathy* does not cure the deficiencies of the combination of *Edson*, *Cameron* and *Tsang et al*, discussed above in connection with independent claims 1, 55, 72, and 210. Therefore, since independent claims 1, 55, 72, and 210 are allowable, Applicant respectfully submits that claims 204 and 208 are allowable for at least the reason that each depends from an allowable claim. Applicant respectfully requests that the rejection of claims 204 and 208 be withdrawn.

21. Findings of Well-Known

Any and all findings of inherency are traversed as not having been shown to be necessarily present. Any and all findings of well-known art and official notice, and potentially similarly interpreted statements should not be considered well known or known since the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions. Examples of similarly interpreted statements include: "well-known standard" for claims 18 and 23 at p. 20, claims 84, 39, 134, and 138 at p. 22, claims 99, 103, 11, 115, 122, and 126 at p. 28, claim 139 at p. 29, claims 144 and 148 at p. 32, claims 155 and 159 at p. 35, claims 164 and 168 at p. 36, claim 170 at p. 38, claims 180, 182, 184, and 186 at p. 41, claims 191, 193, 195, and 197, claims 203, 205, 207, and 209 at p. 50; "common set-top box functionality" for claims 80 and 130 at p. 21, claim 140 at p. 31, claim 151 at p. 34,

claim 162 at p. 37; and “well-known technique” for claim 93 at p. 23, claim 104 at p. 24, claim 178 at p. 41, claim 189 at p. 45, claim 201 at p. 49.

22. Newly Added Claims

Applicants submit that new claims 248-255 are allowable over the cited references, and therefore request that the Examiner enter and allow the new claims. Since the independent claims are allowable for at least the reasons discussed above, dependent claims 248-251 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Independent claim 252 is allowable for at least the reason that the cited references do not disclose, teach, or suggest at least the feature of “network address translation (NAT) logic configured to translate an IP address in one of the packets that is destined for the first CPE data device such that the one of the packets appears to be sent from the stored MAC address associated with the first CPE address when the one of the packets is communicated across the at least one RF cable interface”.

Independent claim 253 is allowable for at least the reason that the cited references do not disclose, teach, or suggest at least the feature of “translating an IP address in one of the packets that is destined for the first CPE data device such that the one of the packets appears to be sent from the stored MAC address associated with the first CPE address when the one of the packets is communicated across the at least one RF cable interface”. Independent claim 254 is allowable for at least the reason that the cited references do not disclose, teach, or suggest at least the feature of “network address translation (NAT) logic configured to translate an IP address in one of the packets that is destined for the first CPE data device such that the one of the packets appears to be sent from the stored MAC address associated with the first CPE address when the one of the packets is communicated across the at least one RF cable interface”. Independent claim 255 is allowable for at least the reason that the cited references do not disclose, teach, or suggest at least the feature of “translating an IP address in one of the

packets that is destined for the first CPE data device such that the one of the packets appears to be sent from the stored MAC address associated with the first CPE address when the one of the packets is communicated across the at least one RF cable interface”.

CONCLUSION

Applicant respectfully requests that all outstanding objections and rejections be withdrawn and that this application and presently pending claims 1-2, 4, 10-24, 55-56, 58, 72-215, and 236-255 be allowed to issue. Any statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. If the Examiner has any questions or comments regarding Applicant's response, the Examiner is encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

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